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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case) (Jointly Administered)  
-and-

Adv. Pro. No. 19-03003 (DM)

**NOTICE OF AGENDA FOR  
APRIL 10, 2019 9:30 A.M.  
OMNIBUS HEARING**

Date: April 10, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

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**PROPOSED AGENDA FOR  
APRIL 10, 2019 9:30 A.M. (PACIFIC TIME)  
OMNIBUS HEARING**

**I. MATTERS SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)**

***WITHDRAWN MATTERS***

1. **Enel Safe Harbor Motion:** Motion and Memorandum of Enel Green Power North America for Entry of an Order Confirming Safe Harbor Protection Under 11 U.S.C. §§ 362(b)(6) and 556 [**Dkt. 481**].

Response Deadline: April 1, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed: No responses were filed.

Related Documents:

- A. Declaration of Giovanni Bertolino in Support of Enel Green Power North America's (I) Motion for Entry of an Order Confirming Safe Harbor Protection Under 11 U.S.C. §§ 362(b)(6) and 556; and (II) Motion to File Under Seal [**Dkt. 484**].
- B. Stipulation between the Debtors and Enel Green Power North America, Inc. to Permit Termination of Capacity Storage Agreements and Interconnection Agreements [**Dkt. 1010**].
- C. Order Granting Stipulation between the Debtors and Enel Green Power North America, Inc. to Permit Termination of Capacity Storage Agreements and Interconnection Agreements [**Dkt. 1023**].
- D. Notice of Withdrawal of Safe Harbor Motion and Motion to File Under Seal [**Dkt. 1043**].

Status: This matter has been withdrawn.

2. **Enel Document Filings Under Seal Motion:** Enel Green Power North America's Motion under 11 U.S.C. §§ 105(a) and 107(b) and FRBP 9018 for Entry of an Order Authorizing the Filing of Certain Contracts and Related Filings Under Seal [**Dkt. 483**].

Response Deadline: April 1, 2019, at 4:00 p.m. (Pacific Time).

Responses Filed: No responses were filed.

Related Documents:

- A. Declaration of Giovanni Bertolino in Support of Enel Green Power North America's (I) Motion for Entry of an Order Confirming Safe Harbor Protection Under 11 U.S.C. §§ 362(b)(6) and 556; and (II) Motion to File Under Seal [**Dkt. 484**].
- B. Notice of Withdrawal of Safe Harbor Motion and Motion to File Under Seal [**Dkt. 1043**].

Status: This matter has been withdrawn.

**II. MATTERS SCHEDULED TO BE HEARD IN ADVERSARY PROCEEDING:**  
**PG&E Corp., et al. v. FERC, Adv. Pro. No. 19-03003 (DM)**

1. **Debtors' Motion for Preliminary Injunction.** Debtor's Motion for Preliminary Injunction and Memorandum of Points and Authorities in Support [AP Dkt. 2].

Response Deadline: Pursuant to the Court's Order Regarding Briefing and Scheduling on Debtors' Motion for Preliminary Injunction [AP Dkt. 91], Defendant FERC's brief in opposition was due February 15, 2019, and the PPA Counterparties' brief in opposition was due at 5:00 p.m. (Pacific Time) on February 22, 2019. Pursuant to the Court's docket entry entered on February 27, 2019, reply briefs by the Debtors and the Official Committee of Unsecured Creditors were due March 13, 2019.

Responses Filed:

- A. **Chevron Response.** Chevron U.S.A. Inc.'s Joinder and Amicus Brief Support of Complaint and Motion for Preliminary Injunction (Docket #1 and #2) [AP Dkt. 75].
- i. Notice of Withdrawal of Document filed at Docket No. 75. [AP Dkt. 107].
- B. **FERC Response.** Defendant Federal Energy Regulatory Commission's Response in Opposition to Debtors' Motion for a Preliminary Injunction and Motion to Dismiss [AP Dkt 87].
- C. **PPA Counterparties' Response.** PPA Counterparties' Opposition to Debtors' Motion for Preliminary Injunction [AP Dkt. 99].
- i. Declaration of Frank R. Lindh in Support of the PPA Counterparties' Opposition to Debtors' Motion for Preliminary Injunction [AP Dkt. 100].
- ii. Declaration of William L. Massey in Opposition to Debtors' Motion for Injunctive Relief [AP Dkt 101].
- iii. Request to Take Judicial Notice in Support of the PPA Counterparties' Opposition to Debtors' Motion for Preliminary Injunction [AP Dkt. 102].
- iv. Supplemental Request for Judicial Notice in Support of PPA Counterparties' Opposition to Debtors' Motion for Preliminary Injunction [AP Dkt. 111].

Related Documents:

- D. Declaration of Fong Wan in Support of Debtors' Motion for Preliminary Injunction [AP Dkt. 3].
- E. Debtors' Request for Judicial Notice in Support of Motion for Preliminary Injunction [AP Dkt. 4].
- F. Memorandum of Points and Authorities in Further Support of Debtors' Motion for Preliminary Injunction [AP Dkt. 136].
- G. Official Committee of Unsecured Creditors' Reply Memorandum of Law in Support of Motion for Preliminary Injunction [AP Dkt. 137].

Status: The matter is going forward.

2. **OCUC Motion to Intervene.** Official Committee of Unsecured Creditors' Motion to Intervene in Adversary Proceeding [AP Dkt. 96].

Response Deadline: Pursuant to the Court's order shortening time [AP Dkt. 105], any response or opposition was to be presented orally at the February 27, 2019 hearing.

Responses Filed:

- A. Opposition to Official Committee of Unsecured Creditors' Motion to Intervene in Adversary proceeding; Memorandum of Points and Authorities [AP Dkt. 106].

Related Documents:

- B. Reply of the Ad Hoc Committee of Senior Unsecured Noteholders in Support of Official Committee of Unsecured Creditors' Motion to Intervene in Adversary Proceeding; Memorandum of Points and Authorities [AP Dkt. 110].
- C. Official Committee of Unsecured Creditors' Supplemental Statement Regarding Motion to Intervene in Adversary Proceeding [AP Dkt. 112].

Status: The matter is going forward.

1       **PLEASE TAKE NOTICE** that copies of any papers filed with the court and referenced  
2 herein can be viewed and/or obtained: (i) by accessing the Court's website at  
3 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450  
4 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims  
5 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-  
4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-  
mail at: [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents  
on the Bankruptcy Court's website.

6 Dated: April 09, 2019

**WEIL, GOTSHAL & MANGES LLP**

**KELLER & BENVENUTTI LLP**

By: /s/ Jane Kim

Jane Kim

*Proposed Attorneys for Debtors and  
Debtors in Possession*